

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-DFB
Plaintiffs	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**DECLARATION OF MILLICENT COTTO
IN SUPPORT OF DEFENDANTS GOOGLE LLC
AND YOUTUBE, LLC'S MOTION TO DISMISS**

I, Millicent Cotto, declare and state as follows:

1. I am a Real Estate Portfolio Executive on the Real Estate & Workplace Services ("REWS") team at Google LLC ("Google"). I work from Google's offices in New York. I have been a Google employee since September 2019.
2. I provide this declaration in support of Google's motion to dismiss. I submit this declaration based on my personal knowledge of the corporate structure of Google and its wholly owned subsidiary, YouTube, LLC ("YouTube") as well as my investigation of the REWS records that track Google and YouTube office space, retail space, or other real property.

3. Google has been headquartered in the Northern District of California since its founding in 1998. It has been headquartered in Mountain View, California in the Northern District of California, since at least 2004.

4. YouTube has been headquartered in San Bruno, California (which is in the Northern District of California), since its founding in 2005, including after Google acquired YouTube in 2006.

5. Google Inc. was incorporated in Delaware in 2002. Google has since converted to an LLC, but remains registered in Delaware.

6. YouTube Inc. was incorporated in Delaware in 2005. YouTube has since converted to an LLC, but remains registered in Delaware.

7. I understand that the Middle District of Pennsylvania is defined as consisting of the counties identified on the Court's website at <https://www.pamd.uscourts.gov/court-info/court-locations>.

8. Based on my investigation, as of March 17, 2025, there are no records of Google owning or leasing any office space, retail space, or other real property in the Middle District of Pennsylvania. As of the date of this declaration, there continues to be no records of Google owning or leasing any office space, retail space, or other real property in the Middle District of Pennsylvania.

9. Based on my investigation, as of March 17, 2025, there are no records of YouTube owning or leasing any office space, retail space, or other real property in the Middle District of Pennsylvania. As of the date of this declaration, there continues to be no records of YouTube owning or leasing any office space, retail space, or other real property in the Middle District of Pennsylvania.

10. Based on my investigation, the only office space that Google or YouTube own or lease in Pennsylvania is Google office space in Pittsburgh, Pennsylvania, located outside the Middle District of Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2025, in New York, NY.


Millicent Cotto